

From: [Carl Larsson](#)
To: [Keith R. Thomas](#)
Subject: EPSAC Public Comment on Private Development Environmental Standards
Date: Monday, November 3, 2025 4:41:54 PM

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Dear Keith,

Thank you for the opportunity to speak during the public comment period at the EPSAC meeting last Wednesday. I'm grateful for the opportunity to speak, as well as for the helpful discussion by members of the committee.

As requested by the committee, I finally had an opportunity to type up a summary of my comments and concerns (below). When you have an opportunity, could you please forward this email to the rest of the committee?

I'd also be happy to connect with anyone who's interested in discussing this topic further, and can be reached by email at ProfCarlLarsson@gmail.com.

Thank you again for everything, and hope you have a great evening!

Best,

Carl Larsson
487 S Mason St

Encouraging Private Sector Environmental Performance Standards - The "Link" Apartments

This public comment concerns the negative environmental impacts of the proposal to build [the "Link" apartments at 473 S Main St](#) (site of the current Lindsey Funeral Home property, immediately adjacent to City Hall, Build Our Park, and the Farmer's Market). The goal of raising these concerns is to seek ways for our city to work constructively towards ensuring that the developer is committed to meeting or exceeding the environmental standards that we require for our own public buildings in the City of Harrisonburg.

The development proposal would bring needed housing to downtown, and its high density in a walkable, downtown area offers environmental and economic benefits. Density alone, however, isn't enough. A large, 265 unit development (with proffers that would allow for up to ~760 bedrooms) must also be designed with many other important considerations in mind (e.g., size and massing relative to its surroundings, impact on the Downtown Historic District, design, affordability, traffic, and downtown parking spillovers, among other issues). Another significant concern is the environmental impact of the proposed development. Some obvious, negative environmental impacts of the proposal include the following:

- **Loss of mature tree canopy**—as noted in the EPSAC July '25 minutes, our citywide canopy already fell 5.5% from 2014–2024 and remains well below the 40% target. The property currently has a number of mature trees, which all appear to be slated for removal under the developer's July rezoning application. Newly planted replacement trees would take decades to mature, and in the meantime the city will lose the public benefits of the mature trees (e.g., carbon sequestration, shade/cooling, mitigation of stormwater runoff). Could the developer preserve and build around some of the mature trees, especially with regard to the largest tree at the southwest corner of the property? This would be in the spirit of the Bryant Heights development that is profiled by Biophilic Cities: <https://www.biophiliccities.org/bcfilms>
- **Exacerbated urban heat island effect** - For example, the 5-6 story parking deck is slated to be built immediately adjacent to the planned Build Our Park space. How will this impact the temperatures and overall experience of visitors to the park, especially during hotter summer months when our city hosts summer concerts? How can the developer mitigate these impacts either by preserving existing, mature trees, or allowing additional set-backs from the property line to plant larger species of trees?
- **Increase in impervious surfaces and stormwater run-off.** Current plans show a drastic increase in impervious surfaces spanning the 2.7 acre property. How will this impact stormwater run-off in the area? How will its very close proximity to Black's Run, almost immediately across the street, impact flooding risk for land and neighborhoods further downstream?
- **Minimal commitment to sustainability features:** For example, the developer in its July Planning Commission application only committed to rough-in for solar (but not to install any panels), only 10 EV chargers in a large, 400+ space garage, and interior bike parking far below the potential cap of ~760 bedrooms (90 interior bike parking spots, and only 8 exterior spots).

To proceed, the developer is requesting a rezoning of the property from R-3 to B-1C. It's my understanding that they are currently gathering further input on the project, and it's my hope that they can strengthen the proposal to better serve the common good of our city. **Rezoning is a discretionary privilege that City Council can vote to approve or deny. It is therefore my hope that City Council will only grant rezoning if the project meets the highest standards for commercial real estate development, including in its environmental performance.** For example, could the developer be asked to commit to LEED certification (or equivalent) as part of any rezoning approval?

I understand EPSAC's stated purpose includes encouraging private projects to follow our city's environmental standards, and I wanted to learn more about how that might work in the case of the Link. Would EPSAC perhaps consider drafting a recommendation to Planning Commission and City Council that any rezoning, if approved, be conditioned on legally binding proffers that meet or exceed our municipal environmental standards, and/or that the developer commit to a recognized building standard such as LEED (or equivalent)? While Planning Commission has expertise in land use and zoning, EPSAC's input on environmental impact could be very helpful to them as they consider whether to recommend approval of the rezoning (I also understand from speaking with a former member of Planning Commission that there's a precedent for members of Planning Commission to consult with other city committees on the various impacts of proposed developments). Or are there other avenues that members of EPSAC could follow to pursue the committee's goal of encouraging private

projects to follow our city's environmental performance standards?

The Link is a high-profile project, with the developer claiming that it's the largest investment in the history of Downtown Harrisonburg. The standards our city holds the developer to on this project could end up setting a precedent for other future development in the city. For that reason, I'd be extremely grateful for any input that the committee may have on recommending high standards for both this project, as well as others that may follow in the future.

From: [Carl Larsson](#)
To: [Rob alexanrw Alexander](#)
Cc: [Keith R. Thomas](#)
Subject: EPSAC Comments on the Link
Date: Monday, March 9, 2026 10:12:36 PM
Attachments: [PastedGraphic-1.png](#)

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Dear Rob and Keith,

I hope you're doing well. As a follow-up to my comments at the EPSAC meeting last fall on private development standards (thank you again for that opportunity!), I'd like to share some additional concerns about the environmental impact of the Link apartment proposal, which is about to go before the Planning Commission in a **public hearing this Wednesday, March 11th**. If possible, I'm interested in sharing these comments with the rest of the committee members on EPSAC, and was wondering if you could please forward this email to them, in addition to including it in the docket for the next EPSAC meeting?

I'd like to start by expressing my gratitude for the work that the committee does in advocating for environmental stewardship and sustainability in our city. With those shared goals in mind, I'd like to gently raise one category of concerns (out of many) that I have on the Link, which is that the currently proposed proffers in the Link's rezoning application fall far short of our city's ideals for environmental performance. **Given our city standards for sustainability, and because the developer has stated a commitment to sustainability (more details below), it's my hope that our Planning Commission will not recommend approval of the rezoning application until the developer has revised its written plan and proffers to be in accordance with the high standards that our city desires to see in large, prominently-located buildings such as the proposed Link apartments.**

Concern #1: Loss of tree canopy. On this, I'd like to reiterate my suggestion that the developer should explore options to preserve as many of the existing, mature trees on the property as possible (see <https://www.biophiliccities.org/>, from Professor Tim Beaty at UVA, for more on preserving trees in new-build developments). Similarly, I'd like to suggest that our city should expect the developer to commit (via written proffers) to a more robust tree planting strategy that aims to achieve a specific canopy/coverage target (as opposed to the current proffers, which are more vaguely written, with sparsely planted trees, and allowances to substitute up to 50% of the required large trees for shrubs or ornamental grasses). This could be further advanced by setting aside additional space on S Main St for **a large, tree-lined promenade that terminates at City Hall (see renderings from John Mathers, attached here;** this design would also preserve our sight-lines of City Hall when traveling up S Main Street. It's my understanding that the rezoning applicant has seen this rendering and should be familiar with the concept.). Imagine the great positive impact that a tree-lined promenade in front of City Hall would have on our city, both in terms of improving our tree canopy, as well as by creating a beautiful, pedestrian-focused public space! The tree-lined promenade is also a design idea that seems to be a point of mutual agreement among many who are both generally in favor and opposed to the 6-story apartments.

Concern #2 on the urban heat island effect, especially due to the large, 6-story concrete parking deck in front of City Hall and immediately adjacent to Build Our Park. On this, I'd like to suggest that our city should not approve anything less than a fully "wrapped" parking deck (aka, a "Texas Donut" design). As an example of wrapped parking, please reference this [recent development at George Mason University](#). The slides show that the developer's original concept had a visible parking deck, but they then revised the plan to hide the parking by wrapping it with residential units along the street. It's a helpful illustration of how feedback during the planning review process can lead to substantial improvements in building design. (Notably, this project implemented wrapped parking despite being outside a historic district; in contrast, the Link site sits within Harrisonburg's historic district and civic core, where even stronger context-sensitive design should reasonably be expected.). Wrapped parking would improve the aesthetics, symbolically demonstrate how much we value people/pedestrians in our downtown civic core, and cut down on the heat radiating onto the park and farmers market from the current design of the large, concrete parking deck. Wrapped parking is also another example of a design change that I feel would have widespread support in our community, including among those who are both generally opposed and in favor of a 6-story building on this lot.

Concern #3 on LEED (or similar) certification. Finally, on the sustainability of the building itself, it concerns me that the developer isn't pursuing any LEED (or similar) certifications. Their sustainability commitments are minimal, as summarized in our city staff report on the Link's rezoning application:

The applicant has proffered sustainability features including, but not limited to, rough-in measures to allow for future installation of solar panels (Proffer I.j.), a minimum of 14 electrical vehicle (EV) charging stations (Proffer III.c.), a minimum of 120 secure indoor bicycle parking spaces, and a minimum of 16 exterior bicycle parking spaces (Proffer III.d.).

The developer is not committing to install solar from the outset (so how likely is it that they will later on?), and out of a 480+ spot parking garage, they're only committing to 14 EV spots (~3% of the total). The developer's application claims they'll offer "bike storage at LEED recommended levels" - this sounds good to me, but imagine how much better it would be if they also followed LEED specifications on all aspects of the project!

An important reason why the LEED certification makes a difference is because research from the EPA shows that buildings generate roughly one-third of greenhouse-gas emissions in the United States, roughly comparable to the emissions from all cars and light trucks combined. I remember being surprised by this when I first encountered the data while studying real estate in graduate school. For this reason, *density alone is not enough to make a building truly sustainable*. The environmental outcome also depends heavily on how the building itself is designed and constructed. [According to the USGBC](#), "*LEED-certified buildings typically consume 25% less energy, reduce carbon emissions by 34%, and use 11% less water.*" For a building the size of the Link, a LEED (or similar) certification would result in a *substantial* reduction in energy use, carbon emissions, and water use.

Furthermore, a LEED (or similar) certification for the Link would set an important precedent for future development while also symbolizing our city's values. The proposed apartments

will sit immediately adjacent to our city's primary civic spaces (e.g., City Hall, Build Our Park, and the Farmers Market), which are places designed to reflect the shared values of our community. Imagine the symbolic statement that a state-of-the-art, energy-efficient building on this block would make about our city's commitment to sustainability and environmental stewardship. Conversely, allowing such a visible project to move forward under its current proffers (which commit only to minimal sustainability features) could unintentionally send the opposite message: that environmental stewardship is not a priority for our city.

City sustainability standards, applied to the Link. Thanks to the work of ESPAC, our city already has high standards for public building sustainability - *shouldn't we expect large, private developers to meet the same standards*, especially when requesting City Council to evaluate whether the proposal creates the public benefit needed to grant the privilege of a discretionary zoning change? Additionally, *many peer communities encourage or require green building certification for large developments such as the Link*. Once again, isn't this something that we, too, should expect of the Link before approving their requested change to the zoning map?

Developer statements and the Downtown 2040 Plan explicitly recommend sustainable building practices on this specific building site:

- The Downtown 2040 Plan (one of our city's guiding documents for planning decisions), clearly states that our city should encourage green building solutions on this specific site adjacent to City Hall (screenshot of this page attached, with the sustainability verbiage highlighted). This very exhibit is included in the developer's current application, and the developer frequently appeals to its commitment to realizing aspects of the Downtown 2040 Plan. I feel this is a good sign that they should be open to improving on the sustainability features of their building, too, to bring them in line with the 2040 Plan.
- The developer's rezoning application states that they have a "proven track record of creating **sustainable**, community-focused developments across the Mid-Atlantic region." (Bold font added for emphasis)
- The developer's [webpage for the Link](#) states, "*The Link will have 136+ secured bike parking spaces and 14 EV charges [sic] to further enhance **our commitment to Harrisonburg's sustainability goals.***" (Bold font for emphasis)

All of this evidence seems to suggest that the developer is both capable of and verbally committed to improving on the sustainability features of its proposed project. **I therefore gently suggest that the Planning Commission should not recommend approval of the current rezoning request until the developer has substantially improved on its proffered commitment to sustainability and environmental stewardship.**

Additional concerns. While this email focuses on environmental concerns with the Link, the [55 pages of public comments](#) attached to the agenda for the 3/11 Planning Commission meeting indicates that there are numerous other, significant issues with the current application for the Link and its merits for rezoning that warrant serious investigation by our city before moving forward with a zoning change. Developers in other cities routinely go through multiple rounds of planning commission before receiving the green light that their plan provides tangible public benefit and meets the city's criteria for rezoning. For all of these reasons combined, **I feel that it's important not to recommend approval of the current application until all of these matters—including, but not limited to, the environmental performance of such a prominent building—can be fully sorted out and improved upon**

in a future, revised application.

Long-term benefits. Any buildings constructed on this property will likely stand for many decades. The effort we invest today towards keeping high standards on this rezoning request will yield large, long-term benefits for our community. Importantly, we need the developer to commit to these changes within the written proffers of their application *before* a rezoning is granted and the city loses much of its leverage.

I hope that some of these ideas may be of service to the committee members in evaluating the rezoning request that will go before Planning Commission this Wednesday for public hearing. I will also forward these thoughts to our city's members of Planning Commission. Thank you all again for your service to Harrisonburg and for the thoughtful attention you give to the long-term well-being of our community.

Best,

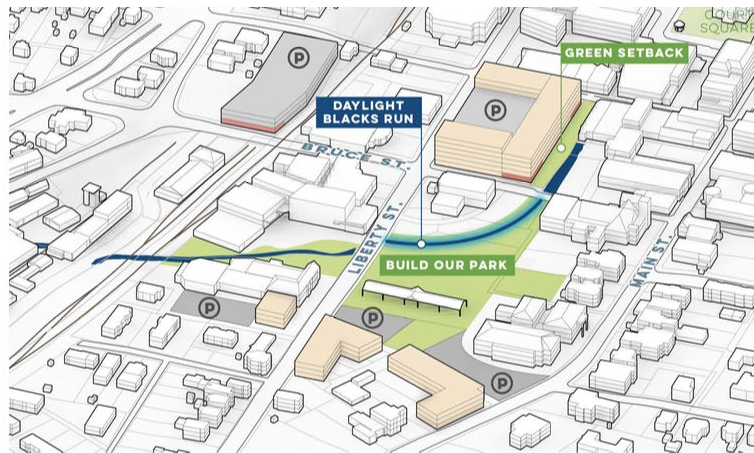
Carl Larsson
487 S Mason St., [SEP]Harrisonburg, VA

P.S. More indirectly related to environmental performance and sustainability, I also have concerns about the high proportion of student-focused, 3- and 4-bedroom units (units that are leased by the bedroom) in the current proposal for the Link. While the developer has offered some slight reductions in these types of student-focused units, **the current proffers still appear to allow for up to ~80% of the total 555 bedrooms to potentially be housed in 3- and 4-bedroom units** (I'm happy to share my calculations on this, if it'd be helpful). This unit mix is consistent with how the developer had originally [labeled the project, "JMU Development / Student Housing"](#) last summer, before later changing the label to "Harrisonburg Development / Market Rate Housing". If we want to create sustainable, centrally-located, walkable housing for both students and non-students alike, **it's my hope that our Planning Commission will not recommend approval of this project until the developer commits in its written proffers to a substantially larger proportion of 1 and 2 bedroom units, at ratios that they prove to be more in-line with local averages for non-student housing apartments.**

Conceptual site plan for:

SOUTH DOWNTOWN

residential commercial parking open space



A

Create more activity south of Water Street - The Ice House has brought new life in Downtown south of the concentration of restaurants along Water and Main Streets. Currently, the Farmers Market anchors what is now a large surface parking lot. The recent parking study indicates the Water Street parking deck should be redeveloped given its age and condition. Redevelop the deck as a new mixed-use structure with housing wrapping a new parking deck. Activate Water Street and Blacks Run with new space for commercial uses. Step the new

building back from Blacks Run as well to create a linear park along the creek to help connect this area south toward the Farmers Market and the proposed park. Integrate new housing close to City Hall to activate the south side of the Farmers Market, encouraging green building solutions, such as solar energy and recycled or sustainable materials. Coordinate with nearby private property owners about the possibility of creating new parking just to the west of Liberty Street intended to serve a range of developments and businesses.

| | |
|-------------------------|--------------------|
| New Parking: | 1,040 spaces |
| Net New Parking: | 270 spaces |
| New Residential: | 270 units |
| New Commercial: | 13,000 square feet |
| New Park Space: | 2 acres |

EXHIBIT 3



MATHER & BALT
ARCHITECTS

